

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al.,)	Case No. 01-1139 (JKF)
)	(Jointly Administered)
Debtors.)	

**MOTION SEEKING LEAVE TO FILE EMERGENCY MOTION TO MODIFY
ORDER REGARDING PRODUCTION OF X-RAYS BASED ON SUBSTANTIAL
NON-COMPLIANCE WITH ORDER**

Debtors request that the Court consider that attached Emergency Motion to Modify Order Regarding Production of X-rays Based on Substantial Non-Compliance With Order on an expedited basis. Counsel for the Debtors raised this issue of non-compliance with the x-ray order at the January 23, 2007 hearing, and the Court directed Debtors to file this motion. Debtors seek an expedited consideration of this motion in an effort to resolve these issues prior to the expert report deadlines. Based on the amended CMO entered December 20, 2006, the expert reports related to estimation methodology are due March 16, 2007, and the supplemental expert reports related to non-estimation methodology issues are due March 30, 2007. Were this Court to hear this motion based on the normal briefing calendar, this motion would not be before the Court until the April 2, 2007 omnibus hearing. The issues raised on the attached motion relate to compliance with a previously entered order and were discussed at the January 23, 2007 hearing with counsel for various claimants and the PI Committee present.

Dated: January 30, 2007

Respectfully submitted,

KIRKLAND & ELLIS LLP

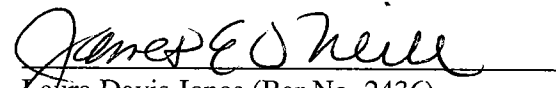
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